

STEVEN T. JAFFE, ESQ.  
Nevada Bar No. 7035  
[sjaffe@lawhjc.com](mailto:sjaffe@lawhjc.com)  
TAYLOR R. ANDERSON, ESQ.  
Nevada Bar No. 15136C  
[tanderson@lawhjc.com](mailto:tanderson@lawhjc.com)

**HALL JAFFE & CLAYTON, LLP**  
7425 Peak Drive  
Las Vegas, Nevada 89128  
(702) 316-4111  
Fax (702) 316-4114

*Attorneys for Defendants Shamrock Foods Company  
and Jose Paz*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

YURIDIA CHAVEZ-HERRERA,  
  
Plaintiffs,  
  
vs.  
  
SHAMROCK FOODS COMPANY, an  
Arizona foreign corporation; JOSE PAZ;  
DOES II through X; and ROE  
CORPORATIONS I through X, inclusive  
  
Defendants

Case No. 2:19-cv-01327-GMN-BNW

**SECOND STIPULATION AND ORDER  
ALLOWING DEFENDANTS  
EXTENSION TO FILE REPLIES IN  
SUPPORT OF THEIR MOTION TO  
DETERMINE THAT NOSHA IS THE  
APPLICABLE LIABILITY STANDARD  
HEREIN AND MOTION TO  
SUBSTITUTE LIABILITY EXPERT**

IT IS HEREBY STIPULATED AND AGREED between the undersigned counsel that Defendant Shamrock Foods Company and Jose Paz's Replies in support of their Motion to Determine That NOSHA is the Applicable Liability Standard Herein and Motion to Substitute Liability Expert, shall be due on Monday, October 24, 2022. The parties are presently involved in discussions and negotiations that would resolve the issues pending in this Motion, . . .

1 and agree to extend this deadline to try and further resolve the issues without the need for  
2 further court involvement.

3  
4 DATED: October 19, 2022

5 **HALL JAFFE & CLAYTON, LLP**

6 */s/ Steven T. Jaffe*

7 STEVEN T. JAFFE, ESQ.  
Nevada Bar No. 7035  
8 TAYLOR R. ANDERSON, ESQ.  
Nevada Bar No. 15136C  
9 7425 Peak Drive  
Las Vegas, Nevada 89128  
10 *Attorneys for Defendants*

DATED: October 19, 2022

**CLAGGETT & SYKES LAW FIRM**

*/s/ Brian Blankenship*

Sean K. Claggett, Esq.  
Nevada Bar No. 8407  
Brian Blankenship, Esq.  
Nevada Bar No. 11522  
Joseph N. Mott, Esq.  
Nevada Bar No. 12455  
Scott E. Lundy, Esq.  
Nevada Bar No. 14235  
4101 Meadows Lane, Suite 100  
Las Vegas, Nevada 89107

Benjamin J. Bingham, Esq.  
Nevada Bar No. 7280  
Ida M. Ybarra, Esq.  
Nevada Bar No. 11327  
**BENSON & BINGHAM**  
11441 Allerton Park Drive, Suite 100  
Las Vegas, NV 89135  
*Attorneys for Plaintiff*

**ORDER**

17 **IT IS SO ORDERED.**

18 Dated this 19 day of October, 2022.

19  
20   
21 Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

22 **Respectfully submitted by:**

23 **HALL JAFFE & CLAYTON, LLP**

24 */s/ Steven T. Jaffe*

25 STEVEN T. JAFFE, ESQ.  
Nevada Bar No. 7035  
26 TAYLOR R. ANDERSON, ESQ.  
Nevada Bar No. 15136C  
27 7425 Peak Drive  
Las Vegas, Nevada 89128  
28 *Attorneys for Defendants*